

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**In re: Methyl Tertiary Butyl Ether  
("MTBE") Products Liability Litigation**

MDL NO. 1358 (VSB)  
Master File No. 1:00-1898

**DEFENDANTS ATLANTIC  
RICHFIELD COMPANY'S, BP  
WEST COAST PRODUCTS  
LLC'S, AND BP PRODUCTS  
NORTH AMERICA INC.'S  
NOTICE OF SETTLEMENT**

---

This Document Relates To:  
*Orange County Water District v. Unocal  
Corp., et al., No. 04 Civ. 4968 (VSB)*

**DEFENDANTS ATLANTIC RICHFIELD COMPANY'S, BP WEST COAST  
PRODUCTS LLC'S, AND BP PRODUCTS NORTH AMERICA INC.'S  
NOTICE OF SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that Defendants Atlantic Richfield Company, BP West Coast Products LLC, and BP Products North America Inc. (collectively, "BP") have settled all disputes with plaintiff Orange County Water District ("OCWD"), and have filed a Notice of Motion for Order Determining Good Faith Settlement. The Motion will be heard on Monday, February 25, 2019, at 1:30 p.m. in Courtroom 7C of the Central District of California, located at 350 W. 1<sup>st</sup> Street, Los Angeles, California, 90012.

Attached hereto as Exhibit A are the Notice of Motion and Memorandum of Points and Authorities filed with the Central District of California on January 23, 2019; Exhibit B is the Declaration of Matthew T. Heartney filed in support of the Motion, with the Settlement Agreement attached as Exhibit 1 thereto; and Exhibit C is the Proposed Order filed therewith.

Dated: January 23, 2019

Respectfully submitted,

ARNOLD & PORTER KAYE  
SCHOLER LLC

By: /s/ Matthew T. Heartney

Matthew T. Heartney  
Attorneys for Defendants  
ATLANTIC RICHFIELD  
COMPANY, BP WEST COAST  
PRODUCTS LLC, BP PRODUCTS  
NORTH AMERICA INC.

**CERTIFICATE OF SERVICE**

The undersigned counsel for BP hereby certifies that a true and correct copy of the foregoing document was served electronically through the CM-ECF (electronic case filing) system to all counsel of record to those registered to receive a Notice of Electronic Filing for this case on January 23, 2019.

/s/ Matthew T. Heartney

Matthew T. Heartney